

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,)	Criminal No. 20-33 DWF/ECW
)	
v. Plaintiff,)	
)	DEFENDANT'S MOTION TO
ERIC QUININ HOLT,)	SUPPRESS STATEMENTS,
)	ADMISSIONS, AND ANSWERS
Defendant.)	

The defendant, Eric Holt, through his undersigned attorney, Douglas L. Micko, moves the Court for an order suppressing all statements, admissions and answers made by the defendant prior to, at the time of, or subsequent to his arrest.

As grounds for said motion, defendant states:

1. That any statements, admissions or answers made by Mr. Holt were made without the assistance or benefit of counsel in violation of defendant's Fifth Amendment and Sixth Amendment rights under the Constitution of the United States.

2. That any statements, admissions, or answers made by Mr. Holt prior to, at the time of, or subsequent to his arrest were not given freely and voluntarily, thereby violating this defendant's rights under the Fourth Amendment and Fifth Amendment to the Constitution of the United States.

3. That any statements, admissions or answers made by Mr. Holt were made without the benefit of a valid Miranda warning or the waiver thereof and were thus obtained in violation of defendant's Fifth Amendment and Sixth Amendment rights under the Constitution of the United States.

4. That any statements made were the product of an illegal warrantless arrest of Mr. Holt that was made without probable cause.

5. For such other reasons as may appear upon an oral hearing of this motion.

Counsel for the government and Mr. Holt have met and conferred regarding the instant motion via electronic mail and telephonically.

Dated: March 13, 2020

Respectfully submitted,

s/ Douglas L. Micko

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